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April 25, 2016

Mark J. Langer, Clerk
United States Court of Appeals
for the District of Columbia Circuit
United States Courthouse
Room 5423
333 Constitution Avenue, N.W.
Washington, D.C. 20001

Re: *Town of Dedham, Massachusetts v. FERC,*
Case No. 16-1098

Dear Mr. Langer:

Enclosed for filing are an original and four (4) copies of the Motion to Intervene of the National Grid Gas Delivery Companies in the above-referenced proceedings, and the Corporate Disclosure Statements for these entities.

Please acknowledge receipt of the enclosures by date-stamping and returning the designated copy to our messenger. Thank you.

Yours truly,

/s/ Kenneth T. Maloney
Kenneth T. Maloney

Attorney for
The National Grid Gas Delivery
Companies

cc: Service List
Secretary, FERC
Solicitor, FERC

**IN THE
UNITED STATES COURT OF APPEALS
FOR THE
DISTRICT OF COLUMBIA CIRCUIT**

-----	:	
Town of Dedham, Massachusetts,	:	
Petitioner,	:	
v.	:	Case No. 16-1098
	:	
Federal Energy Regulatory Commission,	:	
Respondent.	:	
-----	:	

**MOTION TO INTERVENE
OF THE NATIONAL GRID GAS DELIVERY COMPANIES**

Pursuant to Rule 15(d) of the Federal Rules of Appellate Procedure, The Brooklyn Union Gas Company d/b/a National Grid NY (“National Grid NY”); KeySpan Gas East Corporation d/b/a National Grid; Boston Gas Company, Colonial Gas Company, collectively d/b/a National Grid; Niagara Mohawk Corporation d/b/a National Grid; and The Narragansett Electric Company d/b/a National Grid, all subsidiaries of National Grid USA, Inc. (collectively the “National Grid Gas Delivery Companies”) hereby jointly and severally move to intervene in the above-captioned proceeding.

In support of this Motion to Intervene the National Grid Gas Delivery Companies respectfully state:

(1) This proceeding was initiated by a Petition for Review filed by the Town of Dedham, Massachusetts (“Town of Dedham”) on March 24, 2016,

seeking review of the following Federal Energy Regulatory Commission (“Commission”) orders:

(a) “Order Issuing Certificate and Approving Abandonment,” Docket No. CP14-96-000, Algonquin Gas Transmission, LLC, 150 FERC ¶ 61,163 (March 3, 2015); and

(b) “Order Denying Rehearing and Dismissing Stay Request,” Docket No. CP14-96-001, Algonquin Gas Transmission, LLC, 154 FERC ¶ 61,048 (January 28, 2016)

(2) The National Grid Gas Delivery Companies are engaged primarily in the purchase and distribution at retail of natural gas, serving approximately 2.3 million customers in New York State and over 1 million customers in Massachusetts and Rhode Island. The National Grid Gas Delivery Companies are parties to FERC Docket No. CP14-96, the proceeding in which orders under review were issued.

(3) At the present time, the National Grid Gas Delivery Companies are respondents which support the Commission’s orders. However, the National Grid Gas Delivery Companies reserve the right to change this designation if circumstances warrant such a change.

(4) As parties to the proceedings below, the National Grid Gas Delivery Companies have a substantial interest which may be directly affected by this

Court's action in this proceeding, and the National Grid Gas Delivery Companies will not be adequately represented by existing parties and may be adversely affected by a resolution in this proceeding.

WHEREFORE, the National Grid Gas Delivery Companies respectfully request that they be permitted to intervene in the above-captioned proceeding.

Respectfully submitted,

The Brooklyn Union Gas Company
d/b/a National Grid NY;
KeySpan Gas East Corporation
d/b/a National Grid;
Boston Gas Company and
Colonial Gas Company,
collectively d/b/a National Grid;
Niagara Mohawk Power Corporation
d/b/a National Grid
The Narragansett Electric Company
d/b/a National Grid

By: /s/ Kenneth T. Maloney

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Attorney for

The National Grid Gas Delivery Companies

Dated: April 25, 2016

**IN THE
UNITED STATES COURT OF APPEALS
FOR THE
DISTRICT OF COLUMBIA CIRCUIT**

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Town of Dedham, Massachusetts,	:	
Petitioner,	:	
v.	:	Case No. 16-1098
	:	
Federal Energy Regulatory Commission,	:	
Respondent.	:	
-----	:	

RULE 26.1 DISCLOSURE STATEMENT

Pursuant to Rule 26.1 of the Federal Rules of Appellate Procedure and Rule 26.1 of the United States Court of Appeals for the District of Columbia Circuit, The Brooklyn Union Gas Company d/b/a National Grid NY; KeySpan Gas East Corporation d/b/a National Grid; Boston Gas Company and Colonial Gas Company, each d/b/a National Grid; Niagara Mohawk Power Corporation d/b/a National Grid; and The Narragansett Electric Company d/b/a National Grid, (collectively the “National Grid Gas Delivery Companies”) hereby jointly and severally file their corporate disclosure statements in the above captioned proceeding.

(1) The Brooklyn Union Gas Company d/b/a National Grid NY is a corporation duly organized and existing under the laws of the State of New York, with an office located at One MetroTech Center, Brooklyn, New York 11201.

(2) KeySpan Gas East Corporation d/b/a National Grid is a corporation duly organized and existing under the laws of the State of New York, with an office located at 175 East Old Country Road, Hicksville, New York 11801.

(3) Boston Gas Company and Colonial Gas Company, each d/b/a National Grid, are corporations duly organized and existing under the laws of the Commonwealth of Massachusetts, with offices located at 40 Sylvan Road, Waltham, Massachusetts 02451.

(4) Niagara Mohawk Power Corporation d/b/a National Grid is a corporation duly organized and existing under the laws of the State of New York, with an office located at 300 Erie Boulevard West, Syracuse, New York 13202.

(5) The Narragansett Electric Company d/b/a National Grid is a corporation duly organized and existing under the laws of the State of Rhode Island, with an office located at 280 Melrose Street, Providence, Rhode Island 02907.

(6) All of the outstanding shares of common stock of The Brooklyn Union Gas Company d/b/a National Grid NY, KeySpan Gas East Corporation d/b/a National Grid, Boston Gas Company and Colonial Gas Company, each d/b/a National Grid, Niagara Mohawk Power Corporation d/b/a National Grid, and The Narragansett Electric Company d/b/a National Grid are directly or indirectly owned by National Grid USA. All of the outstanding shares of common stock of

National Grid USA are owned by National Grid North America Inc. All of the outstanding shares of common stock of National Grid North America Inc. are owned by National Grid (US) Partner 1 Limited. All of the outstanding ordinary shares of National Grid (US) Partner 1 Limited are owned by National Grid (US) Investments 4 Limited. All of the outstanding ordinary shares of National Grid (US) Investments 4 Limited are owned by National Grid (US) Holdings Limited. All of the outstanding ordinary shares of National Grid (US) Holdings Limited are owned by National Grid plc. National Grid plc is a public limited company organized under the laws of England and Wales, with ordinary shares listed on the London Stock Exchange, and American Depositary Shares listed on the New York Stock Exchange. No publicly held corporation owns more than 10% of National Grid plc's outstanding ordinary shares.

Respectfully submitted,

The Brooklyn Union Gas Company
d/b/a National Grid NY;
KeySpan Gas East Corporation
d/b/a National Grid;
Boston Gas Company and
Colonial Gas Company,
collectively d/b/a National Grid;
Niagara Mohawk Power Corporation
d/b/a National Grid
The Narragansett Electric Company
d/b/a National Grid

By: /s/ Kenneth T. Maloney

Kenneth T. Maloney

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Attorney for

The National Grid Gas Delivery Companies

Dated: April 25, 2016

FERC Docket No. CP14-96 Electronic Service List:

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document by first class mail, postage prepaid, upon the Solicitor and the Secretary of the Federal Energy Regulatory Commission, and upon each person designated on the official service list compiled by the Secretary in the proceeding below and attached to the original of this certificate of service.

Dated at Washington, D.C. this 25th day of April, 2016.

By: /s/ Kenneth T. Maloney
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